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15 UNITED STATES BANKRUPTCY COURT

16 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

17  
18 In re

Case No. 23-30564

19 THE ROMAN CATHOLIC ARCHBISHOP  
20 OF SAN FRANCISCO,

Chapter 11

21 Debtor and  
22 Debtor in Possession.

**DEBTOR'S APPLICATION TO EXTEND  
TIME TO FILE SCHEDULES AND  
STATEMENT OF FINANCIAL AFFAIRS**

[No Hearing Required]

23  
24 Debtor and debtor in possession The Roman Catholic Archbishop of San Francisco (the  
25 "Debtor" or the "RCASF") in the above-captioned chapter 11 case makes this Application (the  
26 "Application") to the Court pursuant to section 521 of title 11 of the United States Code (the  
27 "Bankruptcy Code"), Rules 1007 and 9006 of the Federal Rules of Bankruptcy Procedure (the  
28 "Bankruptcy Rules"), and Local Bankruptcy Rule 9006-1(c) for entry of an order (i) extending the

1 deadline for the Debtor to file its schedules of assets and liabilities and statement of financial affairs  
2 (the “Schedules and SOFA”) for 16 days to and including September 21, 2023. This Application  
3 is supported by the *Declaration of Joseph J. Passarello in Support of Chapter 11 Petition and*  
4 *Debtor’s Emergency Motions* (the “First Day Declaration”) filed August 21, 2023 (ECF 14), the  
5 *Declaration Paul J. Pascuzzi* in support of this Application. In further support of this Application,  
6 the Debtor states as follows:

### 7 **JURISDICTION AND VENUE**

8 1. This Court has jurisdiction over this case and this matter pursuant to 28 U.S.C.  
9 §§ 157 and 1334. This is a core proceeding within the meaning of 28 U.S.C. §157(b)(2)(A). Venue  
10 is proper in this district pursuant to 28 U.S.C. §§ 1408 and 1409. The statutory predicates for the  
11 relief requested herein are section 521 of Bankruptcy Code and Federal Rules of Bankruptcy  
12 Procedure (“Bankruptcy Rules”) 1007 and 9006 of the Bankruptcy Rules.

### 13 **BACKGROUND**

14 2. On August 21, 2023 (“Petition Date”), the Debtor filed a voluntary petition for relief  
15 under Chapter 11 of the Bankruptcy Code in the United States Bankruptcy Court for the Northern  
16 District of California. No trustee, examiner or creditors’ committee has been appointed in this  
17 chapter 11 case. The Debtor remains as Debtor in Possession pursuant to 11 U.S.C. §§ 1107 and  
18 1108.

19 3. The Debtor is a religious organization whose primary role is to provide resources,  
20 spiritual leadership, direction, support, planning, programming, leadership development and other  
21 services to individuals of the Roman Catholic faith, the 88 Parishes, four Archdiocesan Catholic  
22 high schools, numerous elementary schools and private independent schools, cemeteries and  
23 various other Catholic-based social and community service organizations that operate in the  
24 Archdiocese. First Day Declaration at ¶ 15.

25 4. The deadline for the Debtor to file its Schedules and Statement of Financial Affairs,  
26 (collectively, the “Schedules”) is September 5, 2023. Bankruptcy Rule 1007(c). The information  
27 required by the U.S. Trustee for the Initial Debtor Interview is due September 19, 2023. The 341  
28 Meeting of Creditors is scheduled to be held on September 28, 2023.

5. The Debtor and its advisors have been diligently preparing the Schedules and continue to gather the information needed for the required filings. The need to prepare the Schedules accurately and in adherence to confidentiality requirements requires significant time and attention from the Debtor's professionals and advisors.

6. Additionally, the Debtor respectfully submits that the size and complexity of its operations, the limited staff available to perform the required internal review of financial records and affairs, the numerous critical operation matters that the Debtor's personnel must address in the early days of this chapter 11 case, and the pressure incident to the commencement of this chapter 11 case provide cause justifying the requested extension of the deadline to file the Schedules. Although the Debtor and its professionals have been working diligently on completing the Schedules, it will be extremely challenging to complete this undertaking without an extension.

7. Due to the amount of information that needs to be gathered from multiple sources to prepare the Schedules and the various demands on the Debtor's employees, the Debtor needs and requests an additional 16 days to prepare the Schedules.

## BASIS FOR RELIEF

8. Bankruptcy Rule 1007(c) permits the extension, for cause, of the time for filing schedules and statements. The Debtor submits ample cause exists for the requested extension.

9. To prepare the Debtor's Schedules, the Debtor must gather information from the Debtor's books, records and documents relating to a multitude of entities, real properties, and contracts. While the Debtor's employees are working diligently to assemble and collate the necessary information, collection of the necessary information requires the expenditure of substantial time and effort on the part of the Debtor's limited and already overburdened employees. The Debtor anticipates that it will need no more than 16 additional days than that otherwise prescribed by the Bankruptcy Rules in order to prepare and file its Schedules in the appropriate format. The Schedules will be filed within 30 days of the Petition Date as required by this Court's Practices and Procedures in Judge Montali's Court (February 2022).

10. Moreover, the Debtor believes that the relief requested in this Application will not prejudice any party-in-interest. The Debtor's Initial Debtor Interview is scheduled for September

1 26, 2023. With the proposed extension up to and including September 21, 2023, the Schedules  
2 will be filed a week before the Debtor's meeting of creditors scheduled for September 28, 2023.

3 **CONCLUSION**

4 WHEREFORE, the Debtor respectfully requests that this Court:

5 1. Enter an order pursuant to Bankruptcy Code section 521 and Bankruptcy Rule  
6 1007(c), extending the time for the Debtor to file its Schedules from September 5, 2023, up to and  
7 including September 21, 2023; and

8 2. Granting the Debtor such other and further relief as is just and proper.  
9

10 Dated: August 29, 2023

11 FELDERSTEIN FITZGERALD WILLOUGHBY  
12 PASCUZZI & RIOS LLP

13  
14 By /s/ Paul J. Pascuzzi

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20 Dated: August 29, 2023

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